

**REMARKS/ARGUMENTS**

This is in response to the Office Action dated October 20, 2009. Claims 1-16 are pending and stand rejected in the outstanding Office Action. Claims 1, 2, 8, 13 and 16 have been amended. Claim 17 has been cancelled.

Applicant thanks the Examiner for consideration of the Information Disclosure Statements filed August 15, 2006.

The Examiner's acknowledgment of the application's claim to foreign priority and receipt of a certified copy of the priority document is appreciated.

The rejection of claims 16 and 17 under 35 U.S.C. §101, as allegedly being directed to non-statutory subject matter, is respectfully traversed.

Regarding claim 16, the Examiner stated that the claim is read as software per se, and as such it does not fall into one of the statutory categories of patentability.

Claim 16 has been amended to recite "*A non-transitory computer readable physical storage medium having tangibly recorded thereon a computer program or programs arranged such that...*". In *Ex parte BO LI*, the Board of Patent Appeals and Interferences at the USPTO held (in a post-Bilski decision) that Beauregard claims (apparatus claims in which a tangible computer storage media is claimed containing software programming steps) are still considered patentable subject matter (*Ex parte BO LI*; Appeal 2008-1213; Decided: November 6, 2008).

Moreover, "When functional descriptive material is *recorded* on some non-transitory computer-readable medium, it becomes structurally and functionally interrelated to the medium and will be statutory in most cases since use of technology permits the function of the descriptive material to be realized", emphasis added, MPEP 2106.01. In the present case, the claim language recites "A non-transitory computer-readable physical storage medium having tangibly recorded

thereon a computer program or programs”, which follows the guidelines of the above caption of the MPEP.

Claim 17 has been cancelled, hence its rejection is moot.

The rejection of independent claims 1 and 13 under 35 U.S.C. §103(a), as allegedly being unpatentable over Ng et al. (US 6,360,223) in view of Bernstein et al. (US 2003/0120651), is respectfully traversed.

Amended claim 1 (similarly for claim 13) recites “calculating the logical implications of such specified values or links, *wherein in response to the input by the user, all the underlying attributes of each of the pair of terms selected by the user are mapped to one another automatically*”. Support for the above amendment can be found, for example, in p. 20, lines 4-7 of the instant specification.

For example, in a non-limiting example implementation of the invention of claim 1, the user intends to map a first representation of a set of concepts and associated attributes, Ontology 1, with a second representation of a set of concepts and associated attributes, Database 1. In a first step, the user connects a concept, “Country” of the first representation with a concept, “Nations” of the second representation (by clicking on the one term and dragging to the other). In response to this action by the user, the system then attempts to map each attribute associated with “Country” of Ontology 1 with each attribute associated with “Nations” of Database 1.

During the execution of the method, the types of these attributes are checked and either matched attributes are mapped to each other automatically, or are not mapped to each other (and marked as requiring attention by the user), p. 20, line 9 to p. 21, line 6. The net result of the method executed by the method of claim 1 is that once the user has selected a pair of two terms from two different representations of a set of concepts and associated attributes, the method automatically

performs the mapping between all the attributes associated with each of the terms selected by the user.

The Examiner acknowledged that Ng does not disclose “calculating the logical implications of such specified values or links”, and turned to Bernstein for the missing limitation.

Bernstein discloses a mapping method between models. This is accomplished by computing similarity coefficients between pairs of elements, the pair of elements including one element from a first (schema) model and one element from the second (schema) model, [0046].

For example, a given similarity relationship may include that "PO" is similar to "purchase order" with weight 0.8 and that "PO" is similar to "post office" with weight 0.7. So, an element of one model named "PO" is more similar to a node in the other model named "purchase order" than one named "post office." Therefore, if model1 contains an element named "PO" and model2 contains two elements named "purchase order" and "post office," then all else being equal, "purchase order" is a better match for "PO" than "post office", see [0052].

Or in another example, Figs. 11 and 12 are matched, and based on similarity (linguistic and structural) between nodes named OrderFK in the two models, the subtree Customer in Fig. 11 will match RecentCust in Fig. 12 rather than OldCust.

In other words, in Bernstein, a pair of specific terms, one from a first Model and one from a second Model are compared based on their similarity so that a matching can be achieved. However, Bernstein does not teach or suggest that in response to a user selecting a specific pair of terms from two Models, all the attributes associated with these two selected terms are attempted to be **mapped** by the method.

Moreover, the invention of claim 1 concerns reacting to inputs made the user. Ng does not describe anything other than a completely non-automated mapping tool. In other words,

whatever a user does is depicted on the screen, but there is no attempt to calculate the logical implications of the user specified concept or attribute values or of the user specified links, let alone map all the underlying attribute values corresponding to the user input.

For the above reasons, claims 1 and 13 are allowable.

It is respectfully requested that the rejection of claims 2-12 and 14-16, each being dependent from claim 1 or 13, also be withdrawn.

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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